

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LINDSAY DANIELS,

Plaintiff,

-against-

THE CITY OF NEW YORK, et al.,

Defendants.
-----X

15-cv-2251 (RJS)

**DECLARATION OF
JAMES SANBORN IN
SUPPORT OF
PLAINTIFF'S
OPPOSITION TO
DEFENDANTS' MOTION
FOR SUMMARY
JUDGMENT**

JAMES SANBORN declares as follows:

1. I am an attorney with Reibman & Weiner, counsel for the plaintiff Lindsay Daniels in the above action, and submit this declaration in support of plaintiff's opposition to defendants' motion for summary judgment.

2. This declaration attaches documents that are referenced in Plaintiff's Response to Defendants' Statement of Material Facts and Additional Material Facts Pursuant to Local Civil Rule 56.1.

3. Attached hereto as Exhibit A is a true and accurate copy of an excerpt of the deposition transcript of Terrence McGrath dated January 7, 2015.

4. Attached hereto as Exhibit B is a true and accurate copy of the memo book of Paul Arico as produced by defendants.

5. Attached hereto as Exhibit C is a true and accurate copy of an excerpt of the deposition transcript of Alejandro Rivas dated August 19, 2014.

6. Attached hereto as Exhibit D is a true and accurate copy of the Declaration

of Edmin Alicea dated November 5, 2015 (with photograph exhibits).

7. Attached hereto as Exhibit E is a true and accurate copy of an excerpt of the deposition transcript of Brendan Regan dated January 28, 2015.

Dated: Brooklyn, New York
January 15, 2016

/s/
James Sanborn (JS-4011)
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